

REMARKS:

In response to the Office Action mailed on March 26, 2003, Applicant wishes to enter the following remarks for the Examiner's consideration. Applicant has amended claims 3 and 4 to remove the phrase "the steps of", so as not to invoke USC 112, paragraph 6, in the interpretation of these claims. No new matter has been added. Applicant has also added a new claim 6 that is the analog of claims 2 and 4, wherein claim 6 depends from claim 5. No new matter has been added. Claims 1-6 are pending in the application.

Claim Rejections 35 USC §103

Claims 1-5 are rejected under 35 USC 103(a) as being unpatentable over Alexander et al. (US Pat. No. 5953009) in view of Kauffert (US Pat. No. 5831598). Applicant respectfully traverses this rejection.

With regard to the Examiner's rejection of claim 1 and claim 3, while Applicant notes with appreciation the Examiner's statement that Alexander fails to teach all the elements of claim 1 and claim 3, Applicant objects to the Examiner's assertion that Kauffert teaches those elements of claim 1 and claim 3 that are not taught by Alexander. Specifically, there is no teaching, suggestion or anticipation of a timer coupled to a control panel and coupled to a controller suitable for sensing duration of key activation. And, significantly, Examiner has not stated with particularity where such teaching occurs.

While Kauffert does teach that actuation of a key for a longer period of time causes a change in key function, **there is no teaching or suggestion in Kauffert of a timer suitable for measuring this period of time.** And there is certainly not any teaching of a timer coupled with a control panel and further coupled with a controller in Kauffert. Indeed, there is no mention whatsoever of a timer in Kauffert! Kauffert teaches on col. 4 lines 50-56 that the microprocessor 17 decides how to handle a keypress, which also teaches that if Kauffert does have a timer functionality this timer functionality lies within keyboard inquiry unit 13 and so is not part of a control panel or coupled to a controller. Indeed, Applicant notes that since the use of a timer is not taught or suggested by Kauffert, it is certainly possible that the user is

responsible for timing duration of key actuation in the teaching of Kauffert. Or, it may be possible that an external device is used to effect the change in key function through some timing mechanism. Any number of embodiments of Kauffert can be envisioned which do not use a timer coupled to a control panel or coupled to a controller. It is not obviated from a reading of Kauffert that a timer is needed or that if a timer is used it is present in a control panel. In any case, since not all elements of claim 1 or claim 3 are taught, suggested or obviated by the combination of Alexander and Kauffert, the rejection of claims 1 and 3 is improper. Reconsideration and allowance of claim 1 and claim 3 is requested at the Examiners earliest convenience.

Applicant strenuously objects to the Examiner's rejection of claim 2 and claim 4, since Examiner has not given any reasoning, basis or support for these rejections. Furthermore, Applicant notes that Kauffert does not teach, suggest, obviate or otherwise anticipate causing the display to cease displaying the help screen information when the user deactivated the key. And, significantly, Examiner has not stated with particularity where such teaching occurs. Kauffert teaches on col. 5 lines 14-16 that the display "cannot only be cleared by the corresponding actuation of the same function key but also by actuation of a different function key". There is no teaching in Kauffert of clearing the display when the user deactivates the same function key. In fact, Applicant notes that the wording of col. 5 lines 14-16 teaches a preferred method ("corresponding actuation of the same function key") as well as an alternative embodiment ("actuation of a different function key"). In light of the above considerations and arguments, reconsideration and allowance of claim 2 and claim 4 is requested at the Examiners earliest convenience. If the 35 USC §103 (a) rejection of claims 1, 3 and 5 is upheld, Applicant reserves the right to modify claims 1, 3, and 5 to include the limitations of claims 2, 4, and 6, respectively.

With regard to the Examiner's rejection of claim 5, while Applicant notes with appreciation the Examiner's statement that Alexander fails to teach all the elements of claim 5, Applicant objects to the Examiner's assertion that Kauffert teaches those elements of claim 5 that are not taught by Alexander. Specifically, there is no

teaching, suggestion or anticipation of a timer within a controller. And, significantly, Examiner has not stated with particularity where such teaching occurs.

While Kauffert does teach that actuation of a key for a longer period of time causes a change in key function, **there is no teaching or suggestion in Kauffert of a timer suitable for measuring this period of time.** And there is certainly not any teaching of a timer coupled with a control panel and further coupled with a controller in Kauffert. Kauffert teaches on col. 4 lines 50-56 that the keyboard enquiry unit 13 measures duration of key actuation and passes this to microprocessor 17 which decides how to handle a keypress. So, if Kauffert does have a timer functionality this timer functionality lies within keyboard enquiry unit 13 and so is not part of a controller. Indeed, Applicant notes that microprocessor 17 decides how a keypress is handled and couples this decision to control unit 21 and text memory 18. So any timing functionality in Kauffert does not occur within control unit 21. In any case, since not all elements of claim 1 or claim 3 are taught, suggested or obviated by the combination of Alexander and Kauffert, the rejection of claims 1 and 3 is improper. Reconsideration and allowance of claim 1 and claim 3 is requested at the Examiners earliest convenience

Applicant further notes that the use of the word "predetermined" in the Applicants claims 1, 3 and 5 as applied to the amount of time a key is activated is not taught, disclosed or otherwise obviated by Kauffert. Kauffert teaches that the keys can be depressed for an adjustable time (col. 5, lines 10-12), but does not teach that this amount of time is predetermined in any manner. **In fact, the use of the word adjustable teaches away from the Applicants claims 1, 3 and 5, since an "adjustable time" as used by Kauffert is not predetermined since it is not fixed at a single value.** Significantly, Examiner has not noted where such teaching occurs within Kauffert. In light of the above arguments and discussion, reconsideration and allowance of claims 1, 3 and 5 is requested at the Examiners earliest convenience.

In light of the foregoing arguments and discussion, Applicant respectfully submits that even if one were to combine the Kauffert and Alexander references in the

manner suggested by the Examiner, the defects of Kauffert are not cured. In light of the above arguments and discussion, reconsideration and allowance of claims 1-5 are requested at the Examiners earliest convenience.

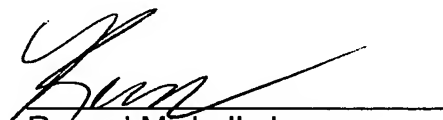
Applicant respectfully submits that claim 2 depends from claim 1 which also contains patentable subject matter, as discussed above, and thus respectfully submits that claim 2 is patentably distinct over the cited references as well.

Applicant respectfully submits that claim 4 depends from claim 3 which also contains patentable subject matter, as discussed above, and thus respectfully submits that claim 4 is patentably distinct over the cited references as well.

In light of the foregoing amendments and remarks, applicant submits that the 35 USC 103(a) rejections of claims 1-5 have been overcome. Reconsideration and allowance of claims 1-6 is therefore respectfully requested at the Examiner's earliest convenience. Although additional arguments could be made for the patentability of each of the claims, such arguments are believed unnecessary in view of the above discussion. The undersigned wishes to make it clear that not making such arguments at this time should not be construed as a concession or admission to any statement in the Office Action.

Please contact the undersigned if there are any questions regarding this response or application.

Respectfully submitted,



Rehee' Michelle Larson
Registration No. 36,193
Larson and Associates, P.C.
221 East Church Street
Frederick, MD 21701
Phone (301) 668-3073
Fax (301) 668-3074
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